



CT Corporation

**Service of Process**

**Transmittal**

03/04/2022

CT Log Number 541165848

**TO:** Patrick Dahlberg  
MCLAREN AUTOMOTIVE, INC.  
1405 S BELT LINE RD STE 100  
COPPELL, TX 75019-4955

**RE:** **Process Served in Illinois**

**FOR:** McLaren Automotive, Inc. (Domestic State: DE)

**ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:**

<b>TITLE OF ACTION:</b>	Re: CHASE LOTFI, // To: McLaren Automotive, Inc.
<b>DOCUMENT(S) SERVED:</b>	--
<b>COURT/AGENCY:</b>	None Specified Case # 2022L001845
<b>NATURE OF ACTION:</b>	Product Liability Litigation - Lemon Law
<b>ON WHOM PROCESS WAS SERVED:</b>	C T Corporation System, Chicago, IL
<b>DATE AND HOUR OF SERVICE:</b>	By Process Server on 03/04/2022 at 03:44
<b>JURISDICTION SERVED :</b>	Illinois
<b>APPEARANCE OR ANSWER DUE:</b>	None Specified
<b>ATTORNEY(S) / SENDER(S):</b>	None Specified
<b>ACTION ITEMS:</b>	SOP Papers with Transmittal, via UPS Next Day Air  Image SOP  Email Notification, Patrick Dahlberg pat.dahlberg@mclaren.com  Email Notification, Nick Ball nick.ball@mclaren.com
<b>REGISTERED AGENT ADDRESS:</b>	C T Corporation System 208 South LaSalle Street Suite 814 Chicago, IL 60604  866-539-8692 CorporationTeam@wolterskluwer.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.



## PROCESS SERVER DELIVERY DETAILS

**Date:** Fri, Mar 4, 2022

**Server Name:** Sheriff Drop

Entity Served	McLaren Automotive, Inc.
Case Number	2022L00184S
Jurisdiction	IL



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FILED  
2/24/2022 1:32 PM  
IRIS Y. MARTINEZ  
CIRCUIT CLERK  
COOK COUNTY, IL  
2022L001845  
Calendar, S  
16838665

2120 - Served                  2121 - Served                  2620 - Sec. of State  
2220 - Not Served              2221 - Not Served              2621 - Alias Sec of State  
2320 - Served By Mail        2321 - Served By Mail  
2420 - Served By Publication 2421 - Served By Publication  
Summons - Alias Summons

(03/15/21) CCG 0001 A

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS**

Name all Parties

CHASE LOTFI

Plaintiff(s)

v.

MCLAREN AUTOMOTIVE, INC.

Case No. 2022L001845

Defendant(s)

CT Corporation System, Registered Agent  
208 S. LaSalle St., Suite 814, Chicago, IL 60604

Address of Defendant(s)

Please serve as follows (check one):  Certified Mail  Sheriff Service  Alias

**SUMMONS**

To each Defendant:

You have been named a defendant in the complaint in this case, a copy of which is hereto attached. You are summoned and required to file your appearance, in the office of the clerk of this court, within 30 days after service of this summons, not counting the day of service. If you fail to do so, a judgment by default may be entered against you for the relief asked in the complaint.

**THERE IS A FEE TO FILE YOUR APPEARANCE.**

**FILING AN APPEARANCE:** Your appearance date is NOT a court date. It is the deadline for filing your appearance/answer. To file your appearance/answer **YOU DO NOT NEED TO COME TO THE COURTHOUSE**, unless you are unable to eFile your appearance/answer. You can download an Appearance form at <http://www.illinoiscourts.gov/Forms/approved/procedures/appearance.asp>. After completing and saving your Appearance form, you can electronically file (e-File) it with the circuit clerk's office.

Iris Y. Martinez, Clerk of the Circuit Court of Cook County, Illinois  
[cookcountyclerkofcourt.org](http://cookcountyclerkofcourt.org)

\* (03/15/21) CCG 0001 B

**Summons - Alias Summons**

**E-FILING:** E-filing is now mandatory with limited exemptions. To e-File, you must first create an account with an e-Filing service provider. Visit <http://efile.illinoiscourts.gov/service-providers.htm> to learn more and to select a service provider.

If you need additional help or have trouble e-Filing, visit <http://www.illinoiscourts.gov/faq/gethelp.asp> or talk with your local circuit clerk's office. If you cannot e-file, you may be able to get an exemption that allows you to file in-person or by mail. Ask your circuit clerk for more information or visit [www.illinoislegalaid.org](http://www.illinoislegalaid.org).

**FEE WAIVER:** If you are unable to pay your court fees, you can apply for a fee waiver. For information about defending yourself in a court case (including filing an appearance or fee waiver), or to apply for free legal help, go to [www.illinoislegalaid.org](http://www.illinoislegalaid.org). You can also ask your local circuit clerk's office for a fee waiver application.

**COURT DATE:** Your court date will be sent to your e-File email account or the email address you provided to the clerk's office. You can also call or email the clerk's office to request your next court date. You will need to provide your case number OR, if unknown, the name of the Plaintiff or Defendant. For criminal case types, you will also need to provide the Defendant's birthdate.

**REMOTE APPEARANCE:** You may be able to attend this court date by phone or video conference. This is called a "Remote Appearance". Call the Circuit Clerk at (312) 603-5030 or visit their website at [www.cookcountyclerkofcourt.org](http://www.cookcountyclerkofcourt.org) to find out how to do this.

Contact information for each of the Clerk's Office locations is included with this summons. The Clerk's office is open Mon - Fri, 8:30 am - 4:30 pm, except for court holidays.

To the officer: (Sheriff Service)

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Atty. No.: 57093

Witness date 2/24/2022 1:32 PM IRIS Y. MARTINEZ

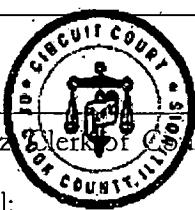
Pro Se 99500

Name: David B. Levin

Atty. for (if applicable):

Plaintiff

Address: 111 West Jackson Blvd., Suite 1700

  
Iris Y. Martinez, Clerk of Court

City: Chicago

Service by Certified Mail: \_\_\_\_\_  
 Date of Service: \_\_\_\_\_  
(To be inserted by officer on copy left with employer or other person)

State: IL Zip: 60604

Telephone: 224-218-0882

Primary Email: [dlevin@toddflaw.com](mailto:dlevin@toddflaw.com)

Iris Y. Martinez, Clerk of the Circuit Court of Cook County, Illinois

[cookcountyclerkofcourt.org](http://www.cookcountyclerkofcourt.org)

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**GET YOUR COURT DATE BY CALLING IN OR BY EMAIL**

**CALL OR SEND AN EMAIL MESSAGE** to the telephone number or court date email address below for the appropriate division, district or department to request your next court date. Email your case number, or, if you do not have your case number, email the Plaintiff or Defendant's name for civil case types, or the Defendant's name and birthdate for a criminal case.

**CHANCERY DIVISION**

**Court date EMAIL:** ChanCourtDate@cookcountycourt.com  
**Gen. Info:** (312) 603-5133

**CIVIL DIVISION**

**Court date EMAIL:** CivCourtDate@cookcountycourt.com  
**Gen. Info:** (312) 603-5116

**COUNTY DIVISION**

**Court date EMAIL:** CntyCourtDate@cookcountycourt.com  
**Gen. Info:** (312) 603-5710

**DOMESTIC RELATIONS/CHILD SUPPORT DIVISION**

**Court date EMAIL:** DRCourtDate@cookcountycourt.com  
 OR  
 ChildSupCourtDate@cookcountycourt.com  
**Gen. Info:** (312) 603-6300

**DOMESTIC VIOLENCE**

**Court date EMAIL:** DVCourtDate@cookcountycourt.com  
**Gen. Info:** (312) 325-9500

**LAW DIVISION**

**Court date EMAIL:** LawCourtDate@cookcountycourt.com  
**Gen. Info:** (312) 603-5426

**PROBATE DIVISION**

**Court date EMAIL:** ProbCourtDate@cookcountycourt.com  
**Gen. Info:** (312) 603-6441

**ALL SUBURBAN CASE TYPES****DISTRICT 2 - SKOKIE**

**Court date EMAIL:** D2CourtDate@cookcountycourt.com  
**Gen. Info:** (847) 470-7250

**DISTRICT 3 - ROLLING MEADOWS**

**Court date EMAIL:** D3CourtDate@cookcountycourt.com  
**Gen. Info:** (847) 818-3000

**DISTRICT 4 - MAYWOOD**

**Court date EMAIL:** D4CourtDate@cookcountycourt.com  
**Gen. Info:** (708) 865-6040

**DISTRICT 5 - BRIDGEVIEW**

**Court date EMAIL:** D5CourtDate@cookcountycourt.com  
**Gen. Info:** (708) 974-6500

**DISTRICT 6 - MARKHAM**

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**Gen. Info:** (708) 232-4551

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### Name all Parties

CHASE LOTFI

**Plaintiff(s)**

V.

MCLAREN AUTOMOTIVE, INC.

Case No. 2022L001845

**Defendant(s)**

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Witness date 2/24/2022 1:32 PM IRIS Y. MARTINEZ

Pro Se 99500

Name: David B. Levin

Atty. for (if applicable):

Plaintiff

Address: 111 West Jackson Blvd., Suite 1700

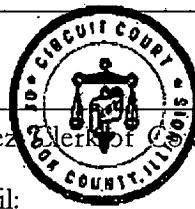
City: Chicago

State: IL Zip: 60604

Telephone: 224-218-0882

Primary Email: dlevin@toddflaw.com

Service by Certified Mail: \_\_\_\_\_  
 Date of Service: \_\_\_\_\_  
 (To be inserted by officer on copy left with employer or other person)



\* 5 0 1 4 6 6 7 5 \*

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Gen. Info: (708) 232-4551

\* IRIS Y. MARTINEZ  
\* 5 CIRCUIT CLERK 5 \*  
COOK COUNTY, IL  
2022L001845  
Calendar, S

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, LAW DIVISION

CHASE LOTFI, )  
 )  
 Plaintiff, ) ) 2022L001845  
 v. ) No.  
 )  
 MCLAREN AUTOMOTIVE, INC., )  
 )  
 Defendant. )

**COMPLAINT**

NOW COMES the Plaintiff, CHASE LOTFI (“Plaintiff”), by and through his attorneys, and for his Complaint against the Defendant, MCLAREN AUTOMOTIVE, INC. (“Defendant”), Plaintiff alleges and states as follows:

**BACKGROUND**

1. At all times relevant herein, Plaintiff, CHASE LOTFI, was a resident of Oak Brook, Illinois.

2. Defendant, MCLAREN AUTOMOTIVE, INC., is a corporation of the State of Delaware, which is licensed to do business in Illinois, which has its primary place of business in Woking, Surrey, England, and its North American headquarters in Coppell, Texas.

3. On or about May 22, 2019, Plaintiff purchased from McLaren Chicago (“Dealer”) a 2019 McLaren 570S Spider (“Spider”), manufactured and/or distributed by Defendant, Vehicle Identification Number SBM13FAA5KW005689, as reflected in the document attached hereto as Exhibit 1.

4. The purchase price of the Spider, including certain collateral charges, such as registration charges, document fees, and sales tax, but excluding finance charges, totaled at least \$204,205.66.

5. With Plaintiff's purchase of the Spider, Defendant issued and supplied to Plaintiff several written warranties, including, but not limited to, a three (3) year, unlimited mileage "bumper to bumper" warranty. The Spider was transferred to Plaintiff during the duration of said warranties and Plaintiff is entitled by the terms of said warranties to enforce the warranties.

6. At the time Plaintiff purchased the Spider from Dealer, the Spider was considered new and was covered by Defendant's written warranties described above.

7. Plaintiff would not have purchased the Spider without Defendant's written warranties described above. Additionally, Plaintiff would not have agreed to purchase the Spider without the knowledge that Plaintiff would be able to enforce Defendant's written warranties.

8. After his purchase of the Spider but during the duration of the written warranties described above, Plaintiff began to experience various defects and conditions within the Spider that substantially impaired the use, value and/or safety of the Spider to Plaintiff.

9. The defects and nonconformities described below violate the express written warranties issued by Defendant, as well as the implied warranty of merchantability.

10. As a result of these defects and non-conformities, Plaintiff has delivered the Spider to Defendant and/or Defendant's authorized servicing dealership(s) for repairs on numerous occasions.

11. Defendant, through its authorized agents, performed repairs on the Spider that were covered by Defendant's written warranties.

12. Defendant allowed Plaintiff to enforce its written warranties by covering needed repairs to the Spider under the terms of Defendant's warranties described above.

13. On information and belief, Defendant reimbursed its authorized servicing dealership(s) for repairs to the Spider pursuant to the terms of Defendant's warranties described

above.

14. Plaintiff has presented the Spider to Defendant's authorized servicing dealership(s) for warranty repairs on numerous occasions for attempted repairs to various defects and nonconformities, including but not limited to:

- a. Defective power windows;
- b. Defective wheels;
- c. Defective visor;
- d. Defective convertible top trim;
- e. Defective oil door;
- f. Defective passenger seat belt warning light; and
- g. Any additional defects and/or non-conformities, which may be contained in the repair records of Defendant's authorized dealerships.

15. Said nonconformities could not reasonably have been discovered by Plaintiff prior to Plaintiff's acceptance of the Spider.

16. After providing Defendant with a reasonable number of attempts and a reasonable period of time to cure the defects in Plaintiff's Spider, the Defendant, through its authorized servicing dealership(s), has refused, has been unable to, and/or has failed to conform the Spider to the terms of its written warranties by repairing the nonconformities and/or defects or replacing the Spider.

17. As a result of the above, the Spider cannot be utilized for personal, family, and household use as was intended by Plaintiff at the time of its acquisition.

18. Having been provided a sufficient opportunity to repair and/or replace the Spider pursuant to its written warranties and having failed to do so, Defendant has violated the express written warranties issued to Plaintiff.

19. Plaintiff has justifiably lost confidence in the Spider's safety and reliability.

20. The Spider remains in a defective and unmerchantable condition, and continues to exhibit some, if not all, of the above-mentioned defects and nonconformities, which substantially

impair its use, value, and/or safety.

21. As a direct and proximate result of Defendant's failure to comply with the provisions of its warranties, Plaintiff has been and will continue to be financially damaged.

**COUNT I**  
**BREACH OF WRITTEN WARRANTY PURSUANT TO**  
**THE MAGNUSON-MOSS WARRANTY ACT**

22. Plaintiff hereby adopts and re-alleges paragraphs 1 through 21 of his Complaint as if fully set forth herein.

23. The Magnuson-Moss Warranty Act, 15 U.S.C. § 2301, *et seq.* ("Warranty Act"), is applicable to Plaintiff in that the Spider was manufactured and purchased after July 4, 1975, and the Spider cost in excess of ten dollars (\$10.00).

24. Plaintiff purchased the Spider, a consumer product, during the written warranty period applicable to the Spider and Plaintiff was entitled to enforce the written warranties against Defendant.

25. Defendant is a "person" engaged in the business of making consumer products directly available to the public and, in this case, to Plaintiff.

26. Plaintiff's purchase of the Spider was accompanied by written factory warranties covering any nonconformities or defects in material or workmanship.

27. Defendant's written warranties were a basis of the bargain of the purchase transaction between Dealer and Plaintiff.

28. Plaintiff's purchase of the Spider was induced by these written warranties and Plaintiff relied upon these written warranties to his detriment.

29. Plaintiff has fully complied with all of his obligations under the written warranties.

30. As a direct and proximate result of Defendant's failure to comply with its express written warranties, Plaintiff has suffered and will continue to suffer damages and, in accordance with 15 U.S.C. § 2310(d)(1), is entitled to bring suit for such damages and other legal and equitable relief, including attorneys' fees incurred in connection with this action.

WHEREFORE, Plaintiff, CHASE LOTFI, prays for judgment against Defendant as follows:

- a. Return of all monies paid or diminution in value of the Spider, and all incidental and consequential damages incurred, including, but not limited to, all finance charges and other collateral charges incurred;
- b. All reasonable attorneys' fees, witness fees, court costs, and other fees incurred by Plaintiff; and
- c. Such other and further relief that this Court deems just and appropriate.

**COUNT II**  
**BREACH OF IMPLIED WARRANTY PURSUANT TO**  
**THE MAGNUSON-MOSS WARRANTY ACT**

31. Plaintiff hereby adopts and re-alleges paragraphs 1 through 21 of his Complaint as if fully set forth herein.

32. The Spider purchased by Plaintiff was subject to an implied warranty of merchantability, as defined in 15 U.S.C. § 2301(7), running from Defendant to Plaintiff.

33. Defendant appointed Dealer as its agent for purposes of transferring the implied warranty of merchantability to Plaintiff.

34. Plaintiff is and was at all relevant times in privity of contract with Defendant.

35. Defendant is prohibited from disclaiming or modifying any implied warranty when making a written warranty to a consumer.

36. Pursuant to 15 U.S.C. § 2308, Plaintiff's Spider was impliedly warranted to be fit for the ordinary purpose for which it was intended.

37. The above-described defects and nonconformities present in the Spider render the Spider unfit for the ordinary purpose for which the Spider was intended.

38. As a direct and proximate result of the Defendant's breach of implied warranty, Plaintiff have suffered and will continue to suffer various damages.

WHEREFORE, Plaintiff, CHASE LOTFI, prays for judgment against Defendant as follows:

- a. Return of all monies paid or diminution in value of the Spider, and all incidental and consequential damages incurred, including, but not limited to, all finance charges and other collateral charges incurred;
- b. All reasonable attorneys' fees, witness fees, court costs, and other fees incurred by Plaintiffs; and
- c. Such other and further relief that this Court deems just and appropriate.

RESPECTFULLY SUBMITTED,

CHASE LOTFI

By: 

---

David B. Levin  
Illinois Attorney No. 6212141  
Attorney for Plaintiff  
Law Offices of Todd M. Friedman, P.C.  
111 W. Jackson Blvd., Suite 1700  
Chicago, IL 60604  
Phone: (224) 218-0882  
Fax: (866) 633-0228  
dlevin@toddflaw.com

**AFFIDAVIT PURSUANT TO ILLINOIS SUPREME COURT RULE 222(b)**

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

The undersigned attorney for Plaintiff hereby certifies that the total of money damages sought in this Complaint does exceed \$50,000, exclusive of interest, costs and attorneys' fees.



---

David B. Levin  
Illinois Attorney No. 6212141  
Attorney for Plaintiff  
Law Offices of Todd M. Friedman, P.C.  
111 W. Jackson Blvd., Suite 1700  
Chicago, IL 60604  
Phone: (224) 218-0882  
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## EXHIBIT 1

